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U.S.D.C. - Atlanta

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DEC 26 2012

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

VIJAY K. VIG ,

Plaintiff,

v.

ALL CARE DENTAL, P.C.,
a Georgia Professional Corporation and
DR. SATPAL K. SHIKH, CEO and
60% shareholder of All Care Dental, P.C

Defendants,

Civil Action File No.

1:11 -CV-4487-WSD

**DEFENDANT'S MOTION TO OBJECT ATTORNEY'S (RALPH GOLDBERG'S)
MOTION FOR WITHDRAWAL AND REQUEST TO EXTEND THE
DISCOVERY PERIOD UNTIL 3/31/13.**


COMES NOW, Satpal Shikh in the above-styled case moves this court to object attorney's (Ralph Goldberg - an attorney for Defendants) withdrawal and to extend the discovery period in this matter through and including 3/31/13 for the following reasons:

Satpal Shikh / All Care Dental, P.C., Defendants just learned independently via computer on Pacer site about Attorney's motion to withdraw that the attorney has moved to withdraw.

All Care Dental, P.C. and Satpal Shikh are currently exploring hiring a new attorney but that Ralph Goldberg an attorney for Defendants should remain defendant's attorney until All Care Dental, P.C has reasonable time and opportunity to locate and retain the replacement counsel.

Satpal Shikh respectfully requests the court as Mr. Goldberg , the attorney has not engaged in any meaningful discovery so far that discovery period should be extended until 3/31/13. Replacement attorney is needed to represent this case as the corporation can not represent itself.

Respectfully submitted on this 24th day of December 2012


Satpal Shikh/All Care Dental PC , Defendants
1745 Highway 138 Suite C-3
Conyers GA 30013

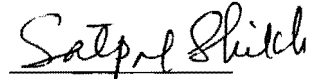
Copy mailed to :
Ralph Goldberg
Attorney for Defendants
Goldberg & Cuvillier, P.C.
755 Commerce Drive, Ste. 600
Decatur, GA 30030

Copy mailed to :
Vijay Vig
P.O Box 1535
Decatur GA 30030

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following individuals the foregoing matter with a copy of this document by depositing in the United States Mail copies of the same in properly addressed envelopes with adequate postage thereon .

This 24th day of December, 2012.



Satpal Shikh/All Care Dental PC
Defendant

VijayK. Vig
P.O. Box 1535
Decatur, GA 30031

Ralph Goldberg
Attorney for Defendants
Goldberg & Cuvillier, P.C.
755 Commerce Drive, Ste. 600
Decatur, GA 30030